

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

(1) JAMIE VICE,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 16-CV-711-JED-FHM
)	
(1) OKLAHOMA DEPARTMENT OF)	
HUMAN SERVICES; and,)	
(2) JOHN DOES 1-30, unknown individuals)	
Employed by OKLAHOMA DEPARTMENT,)	
OF HUMAN SERVICES,)	
)	
Defendants.)	

NOTICE OF REMOVAL

1. The Oklahoma Department of Human Services ("OKDHS") is a Defendant in a civil action brought against it in the District Court of Delaware County, State of Oklahoma, and titled Jamie Vice v. Oklahoma Department of Human Services, et al., Case No. CJ-16-43 (Delaware County District Court).

2. At the time of filing this action and at the present time, the Plaintiff was and is seeking recovery in this case against Defendant OKDHS for alleged violations of the Title VII of the Civil Rights act of 1964, 42 U.S.C. §2000e et. seq, (with pendent state claims).

3. This is the kind of action of which the United States District Courts have original jurisdiction pursuant to 28 U.S.C. §1331 (and the jurisdictional provisions of Title VII of the Civil Rights Act because the Plaintiff's claims arise under the Constitution, laws or treaties of the United States, including Title VII.

4. The aforementioned action was initially commenced on March 14, 2016, and service of summons in the case was then made upon Defendant OKDHS on August 30,

2016. Defendant OKDHS filed a Motion to Dismiss Plaintiff's Petition on September 16, 2016. Plaintiff filed a First Amended Petition on September 30, 2016. Defendant filed a Motion to Dismiss Plaintiff's First Amended Petition on October 13, 2016. Plaintiff filed a Second Amended Petition on October 27, 2016, which added federal claims. Therefore this Notice of Removal is timely filed by Defendant OKDHS under the provisions of 28 U.S.C. §1446.

5. Copies of all process, pleadings and orders served upon Defendant OKDHS or filed in the aforementioned state action (and a copy of the state court's docket sheet in that case) are attached hereto as Exhibits 1 through 8 and made a part hereof.

Respectfully submitted,

s/ Anastasia S. Pederson

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*Attorney for Defendant Oklahoma
Department of Human Services.*

CERTIFICATE OF SERVICE

I certify that on the same date this Notice of Removal was filed in the United States District Court for the Northern District of Oklahoma that a true and correct copy of said Notice of Removal was mailed to said Court Clerk of Delaware County, Oklahoma, for filing this 28th day of November, 2016, and to the Plaintiff through her attorney of record:

Tony Mareshie
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P. O. Box 330161
Tulsa, OK 74133-0161

Attorney for Plaintiff.

s/ Anastasia S. Pederson

Anastasia S. Pederson